IN THE UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF DELAWARE

| | | Re: Docket No.: 14680 4/2/07 Agenda Item No. 10 |
|-------------------------------------|---|--|
| Debtors. |) | • |
| |) | Jointly Administered |
| W. R. GRACE & CO., <u>et al.</u> ,1 |) | Case No. 01-01139 (JKF) |
| |) | _ |
| In re: |) | Chapter 11 |

CERTIFICATION OF COUNSEL REGARDING ORDER APPROVING STIPULATION RESOLVING CERTAIN OF G-I HOLDINGS, INC. AND <u>ITS AFFILIATES</u>

1. On February 26, 2007, the Debtors and Debtors in Possession filed the Debtors' Twenty-First Omnibus Objection to Claims (Substantive) (the "Twenty-First Omnibus Objection) seeking an Order disallowing and expunging the claims set forth in the exhibits attached to the Twenty-First Omnibus Objection (Docket No. 14680).

¹ The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

- 2. The Debtors and G-I Holdings, Inc and its affiliates have agreed on the proposed form of Order pursuant to which certain of the claims of G-I Holdings, Inc. and its affiliates are to be disallowed and expunged.
- 3. Accordingly, the Debtors respectfully request that the Court enter the attached Proposed Order at its earliest convenience.

Dated: March <u>19</u>, 2007

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Possession